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BY HAND

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: **CC Docket No. 92-166**

Dear Mr. Caton:

This letter is submitted on behalf of TRW Inc. ("TRW") in response to the recent filing of an Agreement in the above-referenced docket by Motorola Satellite Communications, Inc. ("Motorola"). The Agreement submitted by Motorola ("October 1996 Agreement") records a consensus among three Mobile-Satellite Service systems that will use the 1610-1626.5 MHz frequency band — Motorola's Iridium LLC affiliate, Odyssey Telecommunications International, Inc., in which TRW is an investor, and Globalstar L.P. — to promote globally the spectrum plan established by the FCC.

TRW wishes to point out that, while the three "Big LEO" systems have agreed to promote the acceptance of the U.S. band plan before other administrations and international bodies, their agreement does not extinguish the issues that remain outstanding in CC Docket No. 92-166 concerning the specifics of this plan. In particular, in its order on reconsideration in that docket, the Commission determined that it was appropriate to discontinue the interim band plan for the Big LEO service, which it had imposed in the 1994 Report and Order in CC Docket No. 92-166 to address the potential

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need to protect the Russian Global Navigation Satellite System ("GLONASS"). The Commission concluded on reconsideration not to implement the interim plan at that time in light of "the substantial uncertainty as to whether protection of GLONASS will ever be necessary in any configuration other than its final configuration at frequencies below 1606 MHz." See Amendment of the Commission's Rules to Establish Rules and Policies Pertaining to a Mobile-Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Band, 11 FCC Rcd 12861, 12865 (¶ 14) (1996). However, the Commission noted that, in the event of imposition of requirements for greater protection of GLONASS, the Commission would advocate, in coordinating the Big LEO systems with GLONASS operations, that the burden of that protection be distributed among all of the Big LEO systems, just as the interim band sharing plan proposed to do. *Id.* at 12865-66.

Both TRW and L/Q Licensee, Inc. ("LQL"), the holder of the authorization for the Globalstar system, sought reconsideration of the Commission's decision. TRW asked that the Commission reinstate the interim band plan given the fact that the actual protection requirements for GLONASS were then no closer to being resolved than when the interim plan was initially adopted by the Commission. See Petition of TRW Inc. for Further Reconsideration at 5-6 (filed April 11, 1996). Although not asking for immediate reimposition of the interim plan, LQL similarly requested "that the Commission clarify that elimination of the interim plan is dependent upon the absence of requirements for out-of-band protection for GLONASS receivers" and, further, that adoption of such requirements would prompt the imposition of some form of interim band sharing to allocate equitably among all licensed Big LEO systems "the burden of any impairment of the 1610-1626.5 MHz band." LQL Petition for Clarification at 5 (filed April 11, 1996). These petitions remain pending before the Commission and therefore may ultimately affect the specifics of the spectrum plan that the three Big LEO systems have pledged to support in the October 1996 Agreement.

Indeed, developments since the filing of TRW's reconsideration petition make it substantially more likely that some form of interim band sharing plan will be necessary. As TRW noted in its recent Petition to Deny Motorola's application for authority to offer AMS(R)S through its Iridium system, TRW intends to supplement its pending reconsideration petition within the next few weeks to bring the record up to date on the current status of negotiations concerning anticipated spectrum usage by GLONASS and the out-of-band emissions restrictions upon Big LEO MSS transmissions that may be applied to protect its operations.

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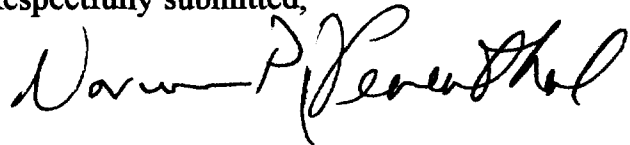
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Should there be questions concerning this matter, please contact the undersigned counsel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Norman P. Leventhal". The signature is fluid and cursive, with the first name "Norman" written in a smaller, more compact script than the last name "Leventhal".

Norman P. Leventhal

Stephen D. Baruch

David S. Keir

Counsel to TRW Inc.

cc: Philip L. Malet, Counsel to Motorola
William D. Wallace, Counsel to LQL
Donald Gips
Thomas S. Tycz